



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 4
ATLANTA FEDERAL CENTER
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ATLANTA, GEORGIA 300303-8960

May 23, 2005

Ms. Julia Cantrell
HQ AFCEE/ISM
3300 Sydney Brooks Road,
Brooks City-Base, TX 78235-5112

Subject: Environmental Impact Statement (EIS) for Housing Upgrades at Eglin Air Force Base and Hurlburt Field, Florida

Dear Ms. Cantrell:

Pursuant to Section (102)(2)(c) of the National Environmental Policy Act (NEPA) of 1996, EPA, Region 4 has reviewed the subject document, an evaluation of a proposed program to demolish, construct, renovate, and lease military family housing at Eglin Air Force Base (AFB) and Hurlburt Field, Florida in an effort to “privatize” aging housing assets.

Specifically, this action would entail conveying 2,739 housing units distributed among several parcels of land located on Elgin and Hurlburt, including infrastructure and utilities, to a private real estate developer and property management company. The private company would demolish a minimum of 2,590 existing dwellings, renovate two units in place, and accept 138 existing units “as is.” Demolition activities would take place over approximately 1,000 acres of land area. The private developer would construct 2,015 new units in phases. Housing units located in the Historic District would be either demolished or returned to the Air Force for adaptive reuse, other than housing. The property on which the new housing is built would be leased to the developer for a period of 50 years.

In addition to the no action alternative, the draft EIS identified six proposed action alternatives that differ primarily in the location and density of new housing. All action alternatives result in varying degrees of impact to the environment and historic resources. Potential environmental and public health concerns included, but not limited to:

- Impacts to local surface water quality due to polluted stormwater runoff during and after construction, as well as boat dock construction;
- Impacts to wildlife and threatened and endangered species due to loss of habitat;

- Impacts associated with land use compatibility, viewsheds, local property values due to inconsistent development adjacent to existing housing communities;
- Impacts to traffic due to the relocation of families from Halburt Field and/or Eglin; and,
- Impacts to cultural and archaeological resources due to demolition of historic buildings or removal of archeological resources.

We have identified a number of concerns with this report and recommend that the Air Force address these issues in the final EIS document. Our concerns and recommendations are listed below.

1. The DEIS presents a total of seven alternatives, including a No Action Alternative. The number of alternatives are excessive and confusing. Please simplify to three or four alternatives at most, including the no action alternative. In addition, the characterization of potential environmental and human health impacts, and proposed actions to avoid, minimize and/or mitigate these impacts within each alternative should be complete. Doing so will result in improved project planning, reduced construction costs and foster acceptability among interested parties.
2. Elgin Air Force Base must comply with new NPDES Phase II requirements yet little, if any, required best management practices are included in this report. For example, post-development stormwater runoff must be controlled both in terms of quantity and quality. How will this project adequately address this new requirement? What guidelines will be used to determine appropriate stormwater management control devices for these sites? Who will be responsible for maintaining the stormwater infrastructure? Who will conduct inspections during and after construction to determine if the structures are performing appropriately? Who and how will enforcement of the new regulations take place?
3. The document does not adequately define sensitive areas and species and so is limited in its ability to ensure unacceptable impacts will not occur. Authors state that if sensitive areas are not adequately avoided and/or if new species become listed as endangered, the Air Force will address the necessity for supplemental environmental documentation consistent with NEPA. The DEIS indicates that all alternatives except alternative 2 will have great potential to impact biological resources due to the extensive amount of land proposed to be cleared. Given this fact, a comprehensive assessment of environmental resources should be completed and significant results included in the development and evaluation of proposed alternatives in the FEIS.

4. The DEIS does not address details of the proposed locations and construction of the structures leaving these and other significant items to the developer yet to be identified. We recommend that these important issues be addressed to a greater extent by the Air Force prior to selection of a developer. This is important for many reasons, one being the developer to be selected must demonstrate experience and expertise in building sustainable military housing. We also recommend that the Air Force and chosen developer utilize “smart growth” concepts in the design and construction of new housing. Smart growth concepts, such as conservation subdivisions and compact building design, facilitate preservation of open space and critical environmental areas as well as improved stormwater management and an enhanced quality of life for military families living both on and off base.
5. Residents living adjacent to the military base have expressed concern that the military’s proposed multi-family will be inconsistent with the current zoning regulations and housing types. The document does not address how these concerns will be adequately addressed. EPA recommends that Air Force representatives work with the local government and citizens to ensure that future development on the base is consistent with the local comprehensive plan and adequately addresses the issues raised by nearby residents.
6. Finally, the demolition of historic structures is a concern to EPA and should be avoided. The document states that alternative 2 is the only alternative resulting in no impacts to cultural resources, and that alternatives 3 and 5 (the preferred alternative) result in the greatest impact to cultural resources. We recognize that the document states that close coordination with the Florida SHPO will take place and so we defer to this Agency with the hope that historical structures and archeological artifacts will be preserved to the greatest extent possible.

In summary, we support the proposed project but request additional information and clarification on the above issues before we can concur with the final Environmental Impact Statement (EIS) for Housing Upgrades at Eglin Air Force Base and Hurlburt Field, Florida. Therefore, we rate the DEIS document as **EC-2** (environmental concerns with insufficient information provided).

Thank you for the opportunity to comment. EPA is available to assist you in the development and implementation of the above recommendations to improve the document and resulting project. If we can be of further assistance in this matter, Ms. Catherine Fox (404-562-9578) will serve as initial point of contact.

Sincerely yours,

/S/

Heinz J. Mueller, Chief
Office of Environmental Assessment